

Statement for the Record

Submitted by
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To the
Subcommittee on Economic Opportunity of the
House Committee on Veterans' Affairs

U.S. House of Representatives
Washington, DC
Regarding its Hearing
*A Review of Licensing and Credentialing Standards for Servicemembers
and Veterans: Do Barrier Still Remains?*

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Good afternoon. My name is Denise Roosendaal. I am the Executive Director of the Institute for Credentialing Excellence (ICE), a 501(c) (3) professional association dedicated to certification excellence and best practices for the credentialing community. We appreciate the importance of the issue of credentialing for active-duty military and veterans who have served our country so honorably. Improving the linkage between credentials for active-duty military personnel and veterans with those in the private sector will help address the unemployment challenges facing veterans, create a smoother transition process and enable more veterans to be workforce ready.

ICE's accrediting body, the National Commission for Certifying Agencies (NCCA), evaluates certification organizations for compliance with the *NCCA Standards for the Accreditation of Certification Programs*. NCCA's Standards exceed the requirements set forth by the American Psychological Association and the U.S. Equal Employment Opportunity Commission. ICE also accredits assessment-based certificate programs for compliance with the ICE 1100 Standard. ICE is accredited by the American National Standards Institute as a Standards Developer.

NCCA's predecessor, the National Commission for Health Certifying Agencies (NCHCA), was chartered by Congress in 1977 and federally funded by a grant from the Department of Health, Education, and Welfare (now the Department of Health and Human Services). The purpose of NCHCA was to develop standards for quality certification programs in the allied health fields and to accredit organizations that met those standards. In the late 1980's, the NCHCA was expanded to include accreditation of certifications for all professions, becoming the National Commission for Certifying Agencies (NCCA) and forming the National Organization for Competency Assurance (NOCA) as a membership association for certification organizations that provides technical and educational services concerning certification practices. In 2009, NOCA became the Institute for Credentialing Excellence (ICE).

The NCCA Standards were the first national personnel certification accreditation standards. Since 1977, the NCCA has granted accreditation to 317 national and international certification programs representing over 50 industries, including occupational therapists, senior financial advisors, surgical nurses, crane operators, executive chefs, athletic trainers, and more.

- The NCCA's accreditation process uses peer review to evaluate an organization's compliance with these standards, recognizes programs which demonstrate compliance, and serves as a resource on quality certification. The latest revisions to the Standards will be effective January 1, 2016 and updates to the NCCA policies and procedures now allow for the Commission to conduct onsite visits of the credentialing organizations if deemed necessary to ensure compliance with the Standards by the applicant certification program.
- NCCA Standards address the structure and governance of the certifying agency, the characteristics of the certification program, the information required to be available to applicants, certificants, and the public, and the recertification initiatives of the certifying agency.
- The *NCCA's Standards for the Accreditation of Certification Programs* used as a foundation the *Standards for Educational and Psychological Testing*, promulgated by the American Psychological Association, American Educational Research Association, and the National Council on Measurement in Education, as well as the guidelines of the US Equal Employment Opportunity Commission. These standards and guidelines are recognized in the certification industry as benchmark practices.

While the issue of transportability of military personnel credentials is an important one, ICE and NCCA are grounded in the concepts around leading practices for ensuring the availability of *quality* credentials. Our military service members need access to *quality* credentialing programs. The means to assessing quality is through third party accreditation such as NCCA, ANSI or other occupational specific accrediting programs. Accreditation is the voluntary process by which a nongovernmental agency grants a time-limited recognition to a certification

program after verifying that it has met predetermined and standardized criteria. During a review, the NCCA commissioners assess administrative elements (governance structure, policies and procedures, candidate handbook, financial and human resources, record retention practices, etc.) psychometric elements (job analysis, exam development and specifications, score reporting, reliability measures, etc.), and elements related to public protection, fairness, and transparency. By examining these aspects and determining compliance or non-compliance with the NCCA Standards, the accreditation process is able to assess the level of quality of a certification program and its sponsoring organization.

Over the years, ICE has participated in discussions and efforts to increase the transportability of military credentials into the private sector as well as identifying ways to smooth and enhance the transition of veterans into their private sector occupations. In 2002, ICE contributed to the development of the Army/Navy Cool websites which helps to identify the various connections between military MOS credentials and private sector ones. The Army/Navy COOL sites maintain an accurate list of NCCA accredited programs and add new NCCA programs when approved. ICE has also participated in the 2012 and 2015 credentialing summits held by the American Legion. The 2015 summit highlighted the fact that much progress has been made while many opportunities for improvement still remain.

Successes and Continued Obstacles

Many certification bodies have been successful in connecting their certification with military personnel. However, based on their experience, a few obstacles are still impeding widespread progress including:

- 1) Alignment of the required knowledge, skills and competencies between military experience and the civilian certification
- 2) Challenges in understanding and communicating certification and military nomenclature and classifications

- 3) Eligibility requirements with no alternative pathways outlined to identify equivalence in military experience and training to traditional academic pathways and work experience
- 4) Lack of awareness of best practices such as governance structures, separation of education and certification or program intent
- 5) The need to educate employers on the value of certifications for veterans
- 6) Inadequate resources for necessary activities (e.g., job analysis mapping; communication activities for outreach to military audience)

1) **Alignment of the required knowledge, skills and competencies:** In conversations with the leaders of our ICE member organizations, we have discovered many success stories that demonstrate a willingness and desire to connect civilian certifications programs with military service men and women. For some certification programs, the links between Military Occupational Specialty (MOS) and private sector equivalent occupations are easily identified and the skills and competencies quickly mapped. In those cases, accommodations might have been made to various policies to address military-specific issues. For example, some organizations allow a time extension for an application deadline or certification renewal deadline in order to accommodate an individual's military deployment schedule. Other certification programs identified accessibility of the exam location as an obstacle. For example, the Board of Pharmacy Specialties Certification Board began offering its exams through the military's Defense Activity for Non-Traditional Education Support (DANTES) system for training and examination for licensed pharmacists as a means to increase exam accessibility.

However, the largest obstacle remains in the area of connecting the military requirements to those of the private sector certification. A job analysis identifies the required knowledge, skills, and competencies for a specific certification. Identifying the gaps between the private sector certification's scope and that those of a specific MOS or occupation in the military is challenging. Ideally, Subject Matter Experts (SMEs) are brought in during the original job

analysis to create a scope broad enough to incorporate the military-stated competencies. A job analysis is completed prior to the establishment of a specific certification and then validated every few years or as changes in the profession dictate. The job analysis then drives the development of the certification exam blueprint. Inclusion of SMEs to identify the gaps between a MOS and the private sector certification requirement during the initial job analysis is the most time efficient and cost effective means of closing the gap. Otherwise, a gap analysis is time consuming and expensive.

Once those gaps are identified, the service member can seek additional training in order to attain the knowledge or skills necessary to successfully pass a certification exam. One successful example of closing the gap is where the American Culinary Federation determined a gap (butchery skills) in one of its certifications and successfully asked the private sector employers to offer that training to the interested military personnel.

2) **Understanding and communicating certification and military nomenclature:** Often, the military nomenclature (or the description of military based competencies) can be an obstacle that prevents the private sector credentialing body from clearly understanding what knowledge, skills and abilities are required for a particular occupation. In particular this confusion is evident when trying to match the eligibility requirements outlined by the private sector credential with military requirements. Often these requirements speak to either a formal degree requirement or a minimum number of years of experience operating in that field. Unfortunately, the credentialing programs often do not have a full understanding of what military experience is acceptable to meet the private sector program's eligibility requirements. For example, the International Hazardous Materials Management organization offers the Certified Hazardous Materials Practitioner (CHMP). Its work eligibility requirements state:

1. *You must have at least 5 years of relevant experience with responsibilities directly related to the handling of hazardous materials and/or waste in the workplace;*¹

¹ Candidate Handbook, Eligibility Requirements for Certified Hazardous Materials Practitioner, *Institute of Hazardous Materials Management*. <http://www.ihmm.org/applicants/eligibility-requirements-chmp>

However, it is not entirely clear which MOSs pertain to hazardous material storage, movement, packaging, and transport or whether five years of civilian experience is equivalent to five years of military experience.

One successful example of how an organization addressed this obstacle is with the Human Resource Certification Institute (HRCI) which connected with the Army Adjutant General's office through the Training with Industry (TWI) program to create an ongoing liaison position to enhance common understanding of terminology, eligibility requirements and alignment between private sector Human Resource positions and military ones. HRCI and the TWI program created a robust alignment and translation between the Army classifications and the HRCI certification requirements.

3) **Eligibility requirements:** Creating alternative pathways for reviewing and connecting the civilian credential eligibility requirements is a critical step so active duty personnel and veterans know their military experience will be eligible to meet civilian credential requirements. For example, some organizations have created alternative pathways for the education level component of their certification's eligibility requirement. So if a four-year degree had been the exclusive requirement, as an alternative the certification body might allow for an associate degree with a certain number of years of experience in lieu of the bachelor degree requirement. The appropriateness of this action would depend upon the profession. The last round of revisions of the NCCA Standards (2003) allowed for alternate pathways for eligibility requirements with a stated rationale for any changes.

4) **Lack of awareness of best practices:** Another obstacle with some military-based certification programs is lack of awareness of private sector best practices. One specific best practice is the establishment of an appropriate governance structure with adequate representation and autonomy. NCCA Standards require separation between education and certification activities with appropriate firewalls to protect the integrity of the exam. In some

cases the traditional military or government agency is not structured appropriately to accommodate this important requirement, or training cannot be obtained elsewhere.

In the cases of a certification being established within the military structure, the job analysis may not have been broad enough to include the identified private sector knowledge, skills, or abilities. If the intent of a specific military certification is to open up the certification to a more broad-based, civilian audience, then the job analysis should be conducted in a way that envisions those private sector knowledge, skills and abilities. NCCA standards require a job analysis be broad enough to incorporate the intended certificant population (military and non-military.)

In some cases, the solution may be in identifying what kind of credential is necessary to accomplish the intent or outcome of the program. For programs that need to assess various competencies through a conformity assessment system (regardless of the origin of the training, education or experience), a certification is appropriate. But other programs need only recognize that a learning event was completed with an evaluation of the mastery of the intended learning outcomes. In these cases, a certificate program is a suitable alternative. Assessment-based certificate programs are intended to build capacity and train participants specifically for certain professions or roles and may be internal or narrower in scope. There are external standards that accredit assessment-based certificate programs, including the ICE 1100 standard to demonstrate that these programs can also have sufficient rigor and quality.

5) **Value of certifications for veterans to employers:** Another obstacle is the difficulty in articulating the value of a certification to a potential employer. The employers need quantifiable information to be able to understand the value of certification. The Executive Director of the American Culinary Federation recently explained that employers in the culinary industry understand that hiring a veteran with a certification reduces training and recruiting

costs, increases recruiting responses, and increases the level of proficiency of their workforce. Sadly, this awareness of these advantages is not the case in all industries or professions.

6) **Inadequate resources for necessary activities:** Non-profit organizations do not always having the resources to conduct the job analysis activities to align the military and private sector job analysis. Likewise many organizations lack the means to reach the military audience. The Army/Navy COOL sites are thorough and are carefully maintained. In fact, 192 NCCA accredited certifications are listed on the site. However, the individual certification organization may not have the resources to promote its certification beyond its traditional candidate audience. The American Culinary Federation is an example of a program that has achieved critical mass in the number of its certificants coming from the military. Success can often be maintained over the longer term when enough employers are either veterans or understand the value of the certification/program.

However, this is not the experience of every program. Investing in a military outreach program can be expensive and confusing since the typical marketing outreach practices are not as effective. Furthermore, confusion exists among the certification organizations and the candidate population around what expenses the military will or will not cover: exam fees, recertification fees, exam prep-training, or other required education. Clarity around this point is important for potential military certificants.

Another resource challenge is finding adequate funding for tracking credentialing outcomes (how many certificants in a particular program are identified as active-duty military or veterans). The RAND Corporation recently released a study addressing outcomes of credentialing programs, mapping the data on what credentials tie to employment. But individual certification organizations do not typically have the resources to conduct such research on their own certificant population.



Thank you for the opportunity to speak with you today. ICE continues to support this important initiative and welcomes the opportunity for even more dialogue with our member organizations on this topic so that we can serve as a resource for you. In fact, we are in the beginning stages of designing a research instrument to gather data on what certifying bodies are currently doing to connect active duty military personnel and veterans to these credentials so that we can understand more fully and more reliably on what obstacles still remain. We hope to have the results of that study within twelve months and will be happy to share the final report with you. ICE remains committed to this important conversation, and we look forward to being a partner in its solution.



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Denise Roosendaal has been Executive Director of the Institute for Credentialing Excellence (ICE) since October 2011. ICE is a 501c3 professional association dedicated to certification excellence and best practices for the credentialing community. ICE has not received federal funding in any form in the past two years. ICE's accrediting body, the National Commission for Certifying Agencies (NCCA), evaluates certification organizations for compliance with the NCCA *Standards for the Accreditation of Certification Programs*.